

MATTHEW W. HOFFMANN, ESQ.
Nevada Bar No. 9061
TYLER M. CRAWFORD, ESQ.
Nevada Bar No. 10559
ATKINSON WATKINS & HOFFMANN, LLP
10789 W. Twain Ave., Suite 100
Las Vegas, NV 89135
Telephone: 702-562-6000
Facsimile: 702-562-6066
Email: mhoffmann@awhlawyers.com
Email: tcrawford@awhlawyers.com
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

EDDIE LOPEZ, an individual;

Plaintiff,

v.

ALBERTSON'S LLC d/b/a ALBERTSONS, a
Foreign Limited-Liability Company; DOES I
through X, inclusive; and ROE
CORPORATIONS I through V, inclusive;

Defendants.

CASE NO.: 2:21-cv-00033-GMN-DJA

**STIPULATION TO EXTEND DISCOVERY PLAN AND SCHEDULING ORDER
(THIRD REQUEST)**

IT IS HEREBY STIPULATED that the parties by and through their attorneys of record, to extend discovery schedule and that the Court enter a new scheduling order containing said agreed-upon dates pursuant to LR 26-3.

A. DISCOVERY COMPLETED TO DATE:

The following discovery has been completed by the parties:

1. Disclosures and supplements of witnesses and exhibits pursuant to FRCP 26.1 by Plaintiff and Defendant;
2. Both parties have served and responded to initial written discovery requests;

3. Defendant served its second set of written discovery requests to which Plaintiff has responded;
4. Plaintiff has served his second set of written discovery requests to Defendant;
5. Plaintiff has provided Defendant with requested authorizations, allowing Defendant the ability to request Plaintiff's medical records in this personal injury action;
6. Defendant has taken the deposition of Plaintiff;
7. Defendant has designated a medical expert witness;
8. Plaintiff has taken the deposition of witness Nicole Eslinger-Glaser;
9. Plaintiff has served notice to take deposition of Defendant's 30(b)(6) witness.

B. DISCOVERY THAT REMAINS TO BE COMPLETED

1. Deposition of Defendant's 30(b)(6) witness;
2. Deposition(s) of treating physician(s);
3. Deposition(s) of expert witnesses;
4. Any other discovery permitted pursuant to the Federal Rules of Civil Procedure deemed necessary by the respective party.

The parties hereby submit this request for additional time and is not due to any delay on the part of any party, nor caused by bad faith or the unwillingness by any party to meaningfully participate in the discovery process. Each party has fully cooperated and participated in all discovery to date.

C. REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED WITHIN THE TIME LIMITS SET BY THE DISCOVERY ORDER:

The parties submit that good cause exists for the discovery extension. Parties are working on scheduling Defendant's 30(b)(6) witness. Due to a change of staffing, Defendant is working on producing the correct witness for the 30(b)(6) witness deposition. Therefore, the parties in this

matter respectfully request a sixty (60) day extension of discovery deadline to allow enough time for Plaintiff to depose the Defendant's 30(b)(6) witness and to complete discovery as a whole.

D. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY:

The undersigned request that the discovery deadlines be extended sixty (60) days to allow for additional time for discovery as follows:

	Current	Proposed
Close of Discovery.....	01/07/2021	03/08/2022
Dispositive Motion Deadline.....	02/07/2022	04/08/2022
Joint Pre-Trial Order.....	03/07/2022	05/06/2022

DATED this 17th day of December, 2021.

DATED this 17th day of December, 2021.

BRANDON | SMERBER LAW FIRM

ATKINSON WATKINS & HOFFMANN, LLP

/s/ Sara Pasquale, Esq.

/s/ Tyler M. Crawford, Esq.

LEW BRANDON, JR., ESQ.

MATTHEW W. HOFFMANN, ESQ.

Nevada Bar No. 5880

Nevada Bar No. 9061

SARA PASQUALE, ESQ.

TYLER M. CRAWFORD, ESQ.

Nevada Bar No. 14412

Nevada Bar No. 10559

139 E. Warm Springs Rd.

10789 W. Twain Avenue, Suite 100

Las Vegas, Nevada 89119

Las Vegas, Nevada 89135

Attorneys for Defendant

Attorney for Plaintiff

ORDER

IT IS SO ORDERED.

DATED this 20th day of December 2021.



UNITED STATES MAGISTRATE JUDGE